

1 BARRY J. PORTMAN
2 Federal Public Defender
2 LARA S. VENNARD
3 Assistant Federal Public Defender
3 160 West Santa Clara Street, Suite 575
3 San Jose, CA 95113
4 Telephone: (408) 291-7753
5 Counsel for Defendant MACHUCA

FILED
JUN - 5 2008
CLERK OF THE COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE

6 IN THE UNITED STATES DISTRICT COURT
7 FOR THE NORTHERN DISTRICT OF CALIFORNIA
8 SAN JOSE DIVISION

9 UNITED STATES OF AMERICA,) No. CR 08-00087 RS
10 Plaintiff,)
11 v.) STIPULATION TO CONTINUE
12) STATUS HEARING; [PROPOSED]
13) ORDER
14)
14) Hon. Richard Seeborg

15 Defendant and the government, through their respective counsel, hereby stipulate that,
16 subject to the court's approval, the hearing in the above-captioned matter, presently scheduled for
17 Thursday, June 5, 2008, at 9:30 a.m. be continued to Tuesday, July 8, 2008, at 11:00 a.m. The
18 continuance is requested to allow time for further settlement negotiation and defense
19 investigation.

20 The parties further agree that time should be excluded under the Speedy Trial Act from
21 June 5, 2008 to July 8, 2008, to allow time for defense investigation and preparation, and because
22 the ends of justice outweigh the defendant's and the public's need for a speedy trial.

23 Dated: 6/3/08

/s/
LARA S. VENNARD
Assistant Federal Public Defender

25 Dated: 6/3/08

/s/
SUSAN KNIGHT
Assistant United States Attorney

STIPULATION TO CONTINUE HEARING;
[PROPOSED] ORDER
No. CR 08-00087 RS

1
2
3
4
5
6 IN THE UNITED STATES DISTRICT COURT
7 FOR THE NORTHERN DISTRICT OF CALIFORNIA
8 SAN JOSE DIVISION

UNITED STATES OF AMERICA,) No. CR 08-00087 RS
10 Plaintiff,)
11 v.) **STIPULATION TO CONTINUE**
12) **STATUS HEARING; [PROPOSED]**
13 MARIA CONSUELO MACHUCA ZUNIGA,) **ORDER** PS
14 Defendant.) Hon. Richard Seeborg

16 The parties have jointly requested a continuance of the hearing set for June 5, 2008, to
17 allow time for continued settlement negotiation and continued defense investigation.

GOOD CAUSE APPEARING, IT IS HEREBY ORDERED that the hearing date presently set for June 5, 2008 at 9:30 a.m. be continued to July 8, 2008, at 11:00 a.m.

Pursuant to the parties' stipulation, IT IS FURTHER ORDERED that the period of time from June 5, 2008, to July 8, 2008, shall be excluded from the period of time within which trial must commence under the Speedy Trial Act, 18 U.S.C. § 3161 et seq.

24 Dated: 6 / 5 / 08

RICHARD SEEBORG
United States Magistrate Judge

**STIPULATION TO CONTINUE HEARING;
[PROPOSED] ORDER
No. CR 08-00087 RS**